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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHELDON LOCKETT; MICHELLE  
DAVIS; and CLYDE DAVIS

*Plaintiffs,*

vs.

COUNTY OF LOS ANGELES, a  
public entity; LOS ANGELES  
COUNTY SHERIFF'S  
DEPARTMENT; a law enforcement  
agency; former SHERIFF JIM  
MCDONNELL; MIZRAIN ORREGO,  
a Deputy Los Angeles County Sheriff;  
SAMUEL ALDAMA, a Deputy Los  
Angeles County Sheriff; and DOES 1  
through 100, inclusive,

*Defendants.*

CASE NO.: 2:18-cv-5838-DSF

**DECLARATION OF ANDREW C.  
PONGRACZ**

**Final Pretrial Conference**

Hearing Date: November 15, 2021

Time: 3:00 p.m.

Courtroom: 7A

**Jury Trial:**

Date: December 14, 2021

Time: 8:30 a.m.

**DECLARATION OF ANDREW C. PONGRACZ**

I, Andrew C. Pongracz, declare as follows:

1. I am an attorney admitted to the United States District Court for the Central District of California. I am an attorney at Seki, Nishimura and Watase, LLP, counsel of record for defendant Samuel Aldama in this matter.

2. I have personal knowledge of the facts contained in this declaration. I could and would testify to the contents of this declaration if called upon to do so.

1           3.     This declaration is submitted in support of Defendants' Motion in  
2     Limine to exclude evidence from and regarding the state court case of *Taylor v*  
3     *County of Los Angeles et al.* (LASC Case No. TC028803) ("*Taylor*")

4           4.     *Taylor* was a wrongful death and civil rights lawsuit filed in the Los  
5     Angeles Superior Court on April 26, 2017 by the successors-in-interest of Donta  
6     Taylor: a man shot and killed on August 25, 2016 by Los Angeles County Sheriff's  
7     Deputies Samuel Aldama and Mizrain Orrego.

8           5.     **Exhibit A** to this declaration is a true and correct copy of the  
9     Complaint filed by John Sweeney, counsel for the Plaintiffs in *Taylor* and Plaintiff  
10    Sheldon Lockett in this case.

11          6.     On November 9, 2018, counsel for the County of Los Angeles filed a  
12    Notice of Conditional Settlement. **Exhibit B** to this declaration is a true and correct  
13    copy of the Notice.

14          7.     On December 18, 2018, counsel for Plaintiffs filed a Petition to  
15    Approve Compromise of Disputed Claim or Pending Action or Disposition of  
16    Proceeds of Judgment for Minor or Person with a Disability (a "Minor's  
17    Compromise). **Exhibit C** to this declaration is a true and correct copy of the  
18    petition, signed under penalty of perjury by Mr. Sweeney.

19          8.     The Minor's Compromise was approved by the Court on or about  
20    January 28, 2019. Following brief litigation regarding attorney's fees and costs, the  
21    settlement was finalized, approved by the Court and all parties, and funded  
22    pursuant to the Court's orders.

23                I declare under penalty of perjury of the laws of the United States the  
24    foregoing is true and correct. Dated October 26, 2021 at Los Angeles, California.

25                               /s/ Andrew C. Pongracz  
26                               Andrew C. Pongracz